

November 1, 2001

Ms. Carolyn Carlson
DaimlerChrysler Corporation
1817 I Avenue
New Castle, IN 47362

Re: **065-14583**
Second Administrative Amendment to
FESOP 065-5619-00001

Dear Ms. Carlson:

DaimlerChrysler Corporation was issued a permit on December 12, 1996 for an automotive parts manufacturing plant. A letter requesting minor administrative changes to the FESOP (065-5619-00001, issued on December 12, 1996) was received on July 9, 2001. Pursuant to the provisions of 2-8-10, the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

SDF

cc: File - Henry County
U.S. EPA, Region V
Henry County Health Department
Air Compliance Section Inspector - Warren Greiling
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 1-800-451-6027

**DaimlerChrysler Corporation New Castle Machining & Forge Plant
1817 "I" Avenue
New Castle, Indiana 47362**

DaimlerChrysler Corporation New Castle Machining & Forge Plant is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 065-5619-00001	Issued: December 12, 1996
First Significant Permit Revision No.: 065-11005-00001	Issued: October 7, 1999
First Administrative Amendment No.: 065-12797-00001	Issued: November 9, 2000
First Minor Permit Modification No.: 065-12960I-00001	Issued: December 8, 2000
Second Minor Permit Modification No. 065-12960-00001	Issued: January 18, 2001
Second Significant Permit Revision No.: 065-13804-00001	Issued June 4, 2001
Second Administrative Amendment No.: 065-14583-00001	Affected Pages: 4, 25 with 25a deleted
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date:

SECTION A SOURCE SUMMARY

A.1 General Information [326 IAC 2-8-3(c)]

The Permittee owns and operates an automotive parts manufacturing source.

Responsible Official: Carolyn M. Carlson, Plant Manager
Source Address: 1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address: 1817 "I" Avenue, New Castle, Indiana 47362
SIC Code: 3714
County Location: Henry
County Status: Attainment for all criteria pollutants
Source Status: Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]

The stationary source consists of the following emission units and pollution control devices:

- a) One (1) natural gas-fired boiler rated at 36 MMBtu per hour, identified as B-1, exhausting through one (1) stack, with #2 fuel oil as backup.
- b) One (1) natural gas-fired boiler rated at 36 MMBtu per hour, identified as B-2, exhausting through one (1) stack, with #2 fuel oil as backup.
- c) One (1) natural gas-fired boiler rated at 36 MMBtu per hour, identified as B-3, exhausting through one (1) stack, with #2 fuel oil as backup.
- d) One (1) shot blasting operation, capacity: 5,762 lbs per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.
- e) One (1) shot blaster, capacity: 4,276 lbs per hour, identified as N-22, equipped with a baghouse, exhausting internally into the building.
- f) One (1) maintenance paint booth, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.
- g) One (1) piston pin packer, capacity: 2,500 parts per hour, identified as N-31, exhausting through Stack 20.
- h) One (1) parts washer, capacity: 0.2 gallons per hour, identified as N-32, exhausting through Stack 6.

A.3 Insignificant Activities [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) shot blasting operation, capacity: 5,762 lbs per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.
One (1) shot blaster, capacity: 4,276 lbs per hour, identified as N-22, equipped with a baghouse, exhausting internally into the building.

Emissions Limitations [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from shot blasting operations N-3 and N-22 shall not exceed 8.33 and 6.82 pounds per hour, respectively.

D.2.2 PM₁₀

PM₁₀ emissions from shot blast operation N-3 shall not exceed 4.50 lb/hr and the PM₁₀ emissions from shot blast operation N-22 shall not exceed 1.84 lb/hr. Therefore, the requirements of 326 IAC 2-7 do not apply.

Testing Requirements [326 IAC 2-8-4(3)]

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.4 Daily Visible Emissions Notations

Daily visible emission notations of the N-3 shot blaster baghouse stack exhaust, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

D.2.5 Broken Bag or Failure Detection

That in the event that bag failure has been observed:

- a) The affected compartments will be shut down immediately until the units have been replaced.
- b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	DaimlerChrysler Corporation
Source Location:	1817 "I" Avenue, New Castle, Indiana 47362
County:	Henry
Operation Permit No.:	F 065-5619-00001
Operation Permit Issuance Date:	December 12, 1996
Permit Amendment No.:	065-14583-00001
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an administrative amendment application from DaimlerChrysler Corporation relating to the operation of their existing automotive parts manufacturing plant.

Summary and Review of Request:

On July 9, 2001, DaimlerChrysler Corporation submitted an application to amend the following Conditions of the new FESOP pages and TSD language of the Second Significant Permit Revision to FESOP 065-5619-00001. The comments and their respective determinations are as follows:

1. Comment 1:

TSD/Pages-Incorrect Name Reference. The TSD and the associated corrected pages of Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) incorrectly describe DaimlerChrysler Corporation as "Daimler Chrysler" or "Chrysler". These references should be changed to "DaimlerChrysler Corporation".

TSD-History Section (Page 1 of 10). As previously discussed, DaimlerChrysler is requesting the following changes to the TSD of Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001).

"The PM emission limitation for shot blast operation N-3 shall increase from 5.38 lb/hr to ~~8.33~~ 8.24 lb/hr and the PM emission limitation for the shot blast operation N-22 shall increase from 4.44 lb/hr to ~~6.83~~ 6.82 lb/hr due to the increased process weight rates."

TSD-County Attainment Status (page 4 of 10). As stated in Section A.1 of the permit, DaimlerChrysler is located in Henry County. DaimlerChrysler is requesting the county location of the TSD of Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) be revised as follows:

"The source is located in ~~Tipton~~ Henry County."

TSD-Proposed Changes (page 7 of 10). As previously discussed, the descriptions of the boilers in the TSD of Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) should be revised as follows to reflect the most current description of the boilers.

- a) One (1) natural gas-fired boiler rated at ~~250~~ 36 MMBtu per hour, identified as B-61, exhausting through one (1) sStack ~~205~~, with #2 fuel oil as backup.
- b) One (1) natural gas-fired boiler rated at ~~31.4~~ 36 MMBtu per hour, identified as B-92, exhausting through one (1) sStack ~~218~~, with #2 fuel oil as backup.
- c) ~~Two (2)~~ One (1) natural gas-fired boilers, ~~each~~ rated at ~~8.37~~ 36 MMBtu per hour, identified as B-403 and B-11, exhausting through one (1) stack, ~~each~~, with #2 fuel oil as backup.

Response 1:

No changes to the Technical Support Document (TSD) are made as a result of comments or requests for changes. Said changes are made in an addendum to the TSD prior to issuance of the respective permit. Since the associated permit (Second Significant Permit Revision (065-13804-00001), issued on June 4, 2001) has been issued, no addendum to its TSD can be made. Thus, none of the changes requested regarding the referenced TSD shall be made.

However, the "permit" can be changed to reflect the most current applicable descriptions and requirements. Therefore, the applicable requested change to the FESOP, amending the Second Significant Permit revision to include the proper company name, shall be made as requested.

2. Comment 2:

Section A.1. The plant manager should be changed as follows to reflect the new plant manager.

"Responsible Official: ~~Jim Robertson~~ Carolyn M. Carlson, Plant Manager"

Response 2:

Condition A.1 of the new FESOP pages of the Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) shall be corrected as follows to reflect the requested responsible official.

A.1 General Information [326 IAC 2-8-3(c)]

The Permittee owns and operates an automotive parts manufacturing source.

Responsible Official:	Jim Robertson Carolyn M. Carlson , Plant Manager
Source Address:	1817 "I" Avenue, New Castle, Indiana 47362
Mailing Address:	1817 "I" Avenue, New Castle, Indiana 47362
SIC Code:	3714
County Location:	Henry
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

3. Comment 3:

Section A.2(a), A.2(b), and A.2(c). Condition A.2 should be amended as follows to reflect the most current descriptions.

- a) One (1) natural gas-fired boiler rated at ~~250~~ 36 MMBtu per hour, identified as B-61, exhausting through one (1) sStack ~~205~~, with #2 fuel oil as backup.
- b) One (1) natural gas-fired boiler rated at ~~31.4~~ 36 MMBtu per hour, identified as B-92, exhausting through one (1) sStack ~~218~~, with #2 fuel oil as backup.

- c) ~~Two (2)~~ One (1) natural gas-fired boilers, ~~each~~ rated at ~~8-37~~ 36 MMBtu per hour, identified as B-403 and B-44, exhausting through one (1) stack, ~~each~~, with #2 fuel oil as backup.

Response 3:

Condition A.2 of the new FESOP pages of the Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) shall be amended as follows to reflect the most recent boiler descriptions.

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]

The stationary source consists of the following emission units and pollution control devices:

- a) One (1) natural gas-fired boiler rated at ~~250~~ 36 MMBtu per hour, identified as B-61, exhausting through **one (1) s**Stack 205, with #2 fuel oil as backup.
- b) One (1) natural gas-fired boiler rated at ~~34.4~~ 36 MMBtu per hour, identified as B-92, exhausting through **one (1) s**Stack 248, with #2 fuel oil as backup.
- c) ~~Two (2)~~ **One (1)** natural gas-fired boilers, ~~each~~ rated at ~~8-37~~ 36 MMBtu per hour, identified as B-403 and B-44, exhausting through one (1) stack, ~~each~~, with #2 fuel oil as backup.
- d) One (1) shot blasting operation, capacity: 3,000 lbs per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.
- e) One (1) shot blasting operation, capacity: 5,762 lbs per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.
- f) One (1) shot blaster, capacity: 4,276 lbs per hour, identified as N-22, equipped with a baghouse, exhausting internally into the building.
- g) One (1) maintenance paint booth, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.
- h) One (1) piston pin packer, capacity: 2 ,500 parts per hour, identified as N-31, exhausting through Stack 20.
- i) One (1) parts washer, capacity: 0.2 gallons per hour, identified as N-32, exhausting through Stack 6.

4. Comment 4:

Section A.2d. The capacity of N-3 shot blast machine has been revised since the original FESOP was issued. The revised capacity is incorporated into the permit under A.2(e) and therefore item A.2(d) is no longer applicable. Therefore DaimlerChrysler requests this item be removed from the permit.

Response 4:

Paragraph (d) of Condition A.2 of the new FESOP pages of the Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) shall be removed as follows, as requested. All other parts of the condition shall be renumbered accordingly.

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)]

The stationary source consists of the following emission units and pollution control devices:

- a) One (1) natural gas-fired boiler rated at ~~250~~ **36** MMBtu per hour, identified as B-61, exhausting through **one (1) s**Stack 205, with #2 fuel oil as backup.
- b) One (1) natural gas-fired boiler rated at ~~31.4~~ **36** MMBtu per hour, identified as B-92, exhausting through **one (1) s**Stack 218, with #2 fuel oil as backup.
- c) ~~Two (2)~~ **One (1)** natural gas-fired boilers, ~~each~~ rated at ~~8.37~~ **36** MMBtu per hour, identified as B-403 and B-14, exhausting through one (1) stack, ~~each~~, with #2 fuel oil as backup.
- ~~d) One (1) shot blasting operation, capacity: 3,000 lbs per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.~~
- ed)** One (1) shot blasting operation, capacity: 5,762 lbs per hour, identified as N-3, equipped with a baghouse, exhausting through Stack 500.
- fe)** One (1) shot blaster, capacity: 4,276 lbs per hour, identified as N-22, equipped with a baghouse, exhausting internally into the building.
- gf)** One (1) maintenance paint booth, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.
- hg)** One (1) piston pin packer, capacity: 2 ,500 parts per hour, identified as N-31, exhausting through Stack 20.
- ih)** One (1) parts washer, capacity: 0.2 gallons per hour, identified as N-32, exhausting through Stack 6.

5. Comment 5:

Section D.2.1 Emission Limitations PM. DaimlerChrysler would like to combine the PM and PM10 limit and will therefore accept the lower limit for both PM and PM10. Therefore, DaimlerChrysler is requesting the following revision:

"Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions (PM/PM10) from shot blasting operations N-3 and N-22 shall not exceed ~~8.33~~ 8.24 and ~~6.83~~ 6.82 pounds per hour, respectively."

Section D.2.2 Emission Limitations PM10. As mentioned in comment 7 above, DaimlerChrysler has elected to combine the PM and PM10 limit and therefore this condition is no longer necessary and should be removed.

Response 5:

326 IAC 6-3 contains requirements that limit the hourly particulate matter (PM) from process operations. The rule does not limit PM10. Combining the PM and PM10 is theoretically possible under 326 IAC 2-7-24, the Part 70 (Title V permit) requirements. However, the DaimlerChrysler permit is a FESOP under 326 IAC 2-8. There is no FESOP (326 IAC 2-8) equivalent to 326 IAC 2-7-24. Therefore, the PM10 limit of Condition D.2.2 cannot and will not be combined with the 326 IAC 6-3 hourly PM limit of Condition D.2.1.

6. Comment 6:

Section D.2.3-Testing Requirements. Recently issued Part 70 permits, in accordance with IDEM policy, have required testing within 36 months. DaimlerChrysler believes the same policy is applicable for FESOP permits. Therefore, the following revision is requested:

"That the Permittee shall conduct stack testing for PM/ and PM10 from the shot blasting operation and baghouses utilizing methods acceptable to the Commissioner. The initial test shall be completed within 24 to 36 months of permit issuance and shall be repeated no less than once every five years from the issuance of the permit unless the owner or operator makes a physical change or change in the method of operation."

Response 6:

The model Title V permit (7-24-01 version) specifies that testing shall be performed during the period between 30 and 36 months after issuance of the permit. The model FESOP (7-24-01 version) also allows up to 36 months. Therefore, Condition D.2.3 of the new FESOP pages of the Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) shall be amended as follows, utilizing the most current approved language.

D.2.3 Particulate Matter

~~That the Permittee shall conduct stack testing for PM and PM10 from the shot blasting operation and baghouses utilizing methods acceptable to the Commissioner. The initial test shall be completed within 24 to 36 months of permit issuance and shall be repeated no less than once every five years from the issuance of the permit unless the owner or operator makes a physical change or change in the method of operation.~~

~~If, within the interim period between tests, the owner or operator makes a physical change or change in method of operation to:~~

- ~~(a) shot blast operation N-3, or N-22, or both, that increases the potential to emit of particulate matter (PM) or PM10 to greater than the 40 CFR 52.21 (326 IAC 12) PSD major source or significant levels, whichever are applicable, or~~
- ~~(b) shot blast operation N-3 or N-22, that increases the potential to emit of particulate matter (PM) or PM10 to greater than 40% of the respective uncontrolled source PM or PM10 emissions, if the baghouses controlling the affected increase in emissions have not been tested in the past five years prior to the date the application for said increase(s) has been submitted, then~~

~~the owner or operator shall perform compliance stack tests for PM, PM10, or both, whichever is applicable, using methods approved by the Office of Air Quality. The first subsequent stack test shall be performed 5 years after the date of completion of the most recent stack test with all subsequent stack tests after that being conducted every five years, unless otherwise required to conduct stack testing.—~~

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, in order to demonstrate compliance with Conditions D.2.1 and D.2.2, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

7. Comment 7:

Emission Calculations for N-3 and N-22. DaimlerChrysler believes the calculations presented in the TSD for Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) are incorrect. The allowable emissions of Condition D.2.1 were determined based on a process weight rate that did not include the shot blast media utilized in the process. DaimlerChrysler is requesting the calculations in this section be revised to reflect the correct process weight rate.

Response 7:

The appropriate process weight rates shall be used as requested and the new respective hourly PM limits determined as follows:

Shot Blast N-3: $E = 4.10 P^{0.67}$, where $P = 2.88$ tons/hr
 $E = 4.10(2.88)^{0.67} = 8.33$ lb PM/hr

Shot Blast N-22: $E = 4.10 P^{0.67}$, where $P = 2.14$ tons/hr
 $E = 4.10(2.14)^{0.67} = 6.82$ lb PM/hr

Condition D.2.1 of the new FESOP pages of Second Significant Permit Revision (065-13804-00001, issued on June 4, 2001) shall therefore be amended as follows to reflect the new hourly PM limits.

D.2.1 Particulate Matter

Pursuant to 326 IAC 6-3 (Process Operations), the particulate matter emissions from shot blasting operations N-3 and N-22 shall not exceed 8.33 and 6.82 pounds per hour, respectively.

Existing Approvals

The source was issued a Federally Enforceable State Operating Permit (F 065-5619-00001) on December 12, 1996. The source has since received the following:

- (a) First Significant Permit Revision:065-11005-00001Issued: 10-07-99
- (b) First Administrative Amendment:065-12797-00001Issued: 11-09-00
- (c) First Minor Permit Modification:065-12960I-00001Issued: 12-08-00
- (d) Second Minor Permit Modification:065-12960-00001Issued: 01-18-01
- (h) Second Significant Permit Revision:065-13804-00001Issued: 06-04-01

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the administrative amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

There are no emission calculations associated with the proposed amendments.

Potential To Emit

There will be no change to the potential to emit as a result of the proposed amendments.

Justification for Administrative Amendment

The FESOP is being amended through an administrative amendment pursuant to 326 IAC 2-8-10(a)(2) which states an administrative amendment includes any change in the name, address, or telephone number of any person identified in the FESOP, or provides a similar minor administrative change at the source.

The proposed amendments consist of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions.

County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.

(b) Henry County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	39.24
PM ₁₀	39.24
SO ₂	35.80
VOC	37.66
CO	18.30
NO _x	73.00

- (a) The above emissions are the existing source emissions obtained from the Second Significant Permit Revision TSD (065-13804-00001, issued June 4, 2001).
- (b) This existing source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (c) This existing source is not a Part 70 major source because no pollutants exceed their Part 70 applicable thresholds.

Potential to Emit of Source After Issuance

There will be no change in the source potential to emit as a result of the proposed amendments because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which affect the potential to emit of the source.

Federal Rule Applicability

New Source Performance Standards (NSPS):

No changes to the permit regarding NSPS are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable NSPS or impact any current conditions in the permit pertaining to NSPS.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

No changes to the permit regarding NESHAPs are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable NESHAPs or impact any current conditions in the permit pertaining to NESHAPs.

State Rule Applicability

Entire Source:

No changes to the permit regarding the entire source state rules are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable entire source state rules or impact the current applicable conditions pertaining to entire source rules.

Individual Facilities:

No changes to the permit regarding individual facility state rules are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable individual facility state rules or impact the current applicable conditions in the permit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

Compliance Determination Requirements:

No changes to the permit regarding compliance determination are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable compliance determination requirements or impact the current applicable compliance determination conditions in the permit.

Compliance Monitoring Requirements:

No changes to the permit regarding compliance monitoring are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable compliance monitoring requirements or impact the current applicable compliance monitoring conditions in the permit.

Recordkeeping and Reporting Requirements:

No changes to the permit regarding recordkeeping and reporting are necessary because the proposed amendments consist only of changing the name of the responsible official and updating the FESOP language to the most recent approved language and descriptions, none of which trigger any new applicable recordkeeping or reporting requirements or impact the current applicable recordkeeping or reporting conditions in the permit.

Conclusion

The source shall be subject to the conditions of the attached proposed pages of 065-14583-00001 and all other applicable requirements under the existing FESOP (F 065-5619-00001, issued on December 12, 1996).